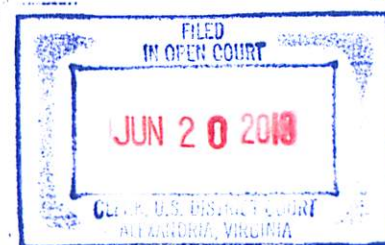


IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

KEITH HEDMAN,
Defendant.

No. 1:13cr74

Consent Order of Forfeiture

WHEREAS, on March 13, 2013, defendant Keith Hedman pled guilty to a two-count criminal information charging the defendant with Major Fraud against the United States, in violation of 18 U.S.C. § 1031, and Conspiracy to Commit Bribery, in violation of 18 U.S.C. § 371, and pursuant to the defendant's plea, the defendant agreed to forfeit certain property that is the subject of this order of forfeiture, to the entry of an order of forfeiture concerning such property, and that the conduct described in the Statement of Facts entered at the time of the defendant's plea provides a basis for the forfeiture of the property sought by the United States;

AND WHEREAS, the defendant agrees to waive the provisions of Federal Rules of Criminal Procedure 11(b)(1)(J), 32.2(a), 32.2(b)(4) and 43(a) with respect to discussion of forfeiture at the plea colloquy, notice of forfeiture in the charging instrument, announcement of the forfeiture at sentencing and incorporation of the forfeiture in the judgment, and any other defense to forfeiture;

NOW, THEREFORE, IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT:

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1. The defendant forfeits to the United States the sum of \$6,149,730.88 in the form of a money judgment representing the proceeds of the criminal conduct the defendant admitted to having committed, pursuant to 18 U.S.C. §§ 981, 982, 983, and 984; 28 U.S.C § 2461; and Fed. R. Crim. P. 32.2(b)(2). Such forfeiture shall be joint and several with any forfeiture ordered as to the following defendants in related cases: *United States v. David Sanborn* (No. 1:13cr68); *United States v. David Lux* (No. 1:13cr70); *United States v. Dawn Hamilton* (No. 1:13cr75); *United States v. Derek Matthews* (No. 1:13cr153); and *United States v. Michael Dunkel* (No. 1:13cr220).

2. This forfeiture order is final as to the defendant, pursuant to Fed. R. Crim. P. 32.2(b)(4)(A) and 18 U.S.C. § 983.

3. The balance due shall be paid as follows:

- a. The defendant shall pay a sum of \$1,573,026.09 on or before the date of sentencing.
- b. The defendant shall deposit the remaining \$4,576,704.79 into his counsel's trust account on or before the date of sentencing. The account may be an interest-bearing account.
- c. Upon any payment made towards forfeiture by another defendant in the cases listed above in ¶ 1, and with the advance approval of the United States, the defendant may withdraw that same amount from his counsel's trust account.
- d. Any amount remaining in defense counsel's trust account on October 4, 2014, shall become due and payable immediately, except that any interest earned in the account will revert back to the defendant.

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4. Upon the seizure of any property in partial satisfaction of the forfeiture money judgment imposed herein, the United States shall, to the extent practicable, provide direct written notice to any persons known to have alleged an interest in the seized property, and shall publish notice of this order in accordance with Fed. R. Crim. P. 32.2(b)(6).

5. The United States may move at any time, pursuant to Fed. R. Crim. P. 32.2(e), to amend this Consent Order of Forfeiture to forfeit substitute property to satisfy the money judgment in whole or in part.

Date: June 20, 2013
Alexandria, Virginia

/s/
Gerald Bruce Lee
United States District Judge

The Honorable Gerald Bruce Lee
United States District Court Judge

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WE ASK FOR THIS:

For the United States of America, plaintiff

For Keith Hedman, defendant

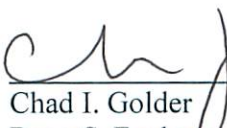

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Defendant

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